

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SCOTT BLAIR,

Plaintiff,

v.

ALSTOM TRANSPORTATION, INC. and
KAWASAKI RAIL CAR, INC.,

Defendants.

C.A. No. 1:16-cv-03391-PAE-JLC

SUPPLEMENTAL DECLARATION OF ZAED M. BILLAH

I, Zaed M. Billah, declare as follows:

1. I am counsel for Defendant Kawasaki Rail Car, Inc. in this case. I submit this supplemental declaration in support of Defendant Kawasaki Rail Car, Inc.'s Motion for Judgment on the Pleadings, a Finding of Exceptional Case, and Attorneys' Fees and Costs Pursuant to 35 U.S.C. § 285 and Fed. R. Civ. P. 54(d).
2. Attached as Exhibit II is a true and correct copy of a Complaint for Patent Infringement in *B.E. Tech, L.L.C. v. Facebook, Inc.*, Case No. 2-12-cv-02769 (W.D. Tenn.) dated September 7, 2012.
3. Attached as Exhibit JJ is a true and correct copy of a letter from Laura Alemzadeh to Michael Stadnick dated December 20, 2010, produced by plaintiff as Blair-45.
4. Attached as Exhibit KK is a true and correct copy of an email from Ameet Modi to Scott Blair and Michael Stadnick dated March 9, 2011, produced by plaintiff as Blair-50-Blair-52.
5. Attached as Exhibit LL is a true and correct copy of an email from Ameet Modi to Scott Blair dated April 28, 2011, produced by plaintiff as Blair-53-Blair-58.

6. Attached as Exhibit MM is a true and correct copy of a letter from Sheila Mortazavi to Ameet Modi dated July 31, 2015, produced by plaintiff as Blair-62-Blair-63.
7. Attached as Exhibit NN is a true and correct copy of a letter from Sheila Mortazavi to Ameet Modi dated October 5, 2015, produced by plaintiff as Blair-68-Blair-69.
8. Attached as Exhibit OO is a true and correct copy of a letter from Sheila Mortazavi to Joseph Gioconda dated December 1, 2015, produced by plaintiff as Blair-86.
9. Attached as Exhibit PP is a true and correct copy of a letter from Joseph Gioconda to Sheila Mortazavi dated November 13, 2015, produced by plaintiff as Blair-16-Blair-30.
10. Attached as Exhibit QQ is a true and correct copy of an email from me to Darius Keyhani and others dated December 11, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 17, 2020



Zaed M. Billah

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2020, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Sheila Mortazavi